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December 4, 2013

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Resources Determinations
Greer Rate Center – BMW Group
Docket No.

Dear Ms. Boyd:

AT&T South Carolina¹ respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Greer Rate Center in the above-captioned matter. In summary:

AT&T South Carolina submitted an NXX Assignment Request via the Pooling Administration System on November 15, 2013;

AT&T South Carolina's customer requesting numbering resources is BMW Group;

AT&T South Carolina requested a full NXX in the Greer exchange;²

The request impacts the Greer rate center;

¹ BellSouth Telecommunications, LLC d/b/a AT&T South Carolina.

² AT&T's customer, BMW Group, informed AT&T that it currently has over 6,000 employees and, based on anticipated future growth needs, "it has become necessary to request an entire NPA/NXX for business continuity." See Exhibit A to Petition.

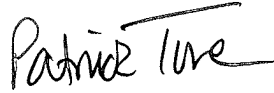
The Honorable Jocelyn Boyd
December 4, 2013
Page Two

At the time of the request, the Greer Rate Center had a "months to exhaust" ("MTE") of 6.176 months;

At the time of the request, the Greer Rate Center had a utilization of 64.982%.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is written in a cursive, flowing style with a horizontal line extending from the end.

Patrick W. Turner

PWT/nml
Attachment
1095637

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S)
PETITION REQUESTING THE COMMISSION’S)
INTERVENTION IN NUMBERING RESOURCES)
DETERMINATIONS)
_____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE GREER RATE CENTER

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina (“AT&T South Carolina”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T South Carolina’s application for use of numbering resources in the 864 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “central office code administration,”¹ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ See, e.g., 47 C.F.R. §52.15.

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer BMW Group.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Greer exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application. The FCC reaffirmed this

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) (“*First NRO Order*”).

requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. AT&T's customer, BMW Group, informed AT&T that it currently has over 6,000 employees and, based on anticipated future growth needs, "it has become necessary to request an entire NPA/NXX for business continuity."⁹ In order to meet this express request of its customer, on or about November 15, 2013, AT&T South Carolina submitted a Pooling Administration System request for the assignment of a full NXX in the Greer exchange.¹⁰ As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Greer Rate Center had a MTE of 6.176 months and a utilization of 64.982%.¹¹

10. Thereafter, also on November 15, 2013, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines.¹² AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Greer Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."¹³

¹⁰ See Exhibit B to this Petition.

¹¹ See *Id.*

¹² See *Id.*

¹³ *Second NRO Order* at ¶ 61.

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory."¹⁵ In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers."¹⁶

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T South Carolina a full NXX in the Greer exchange; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 4th day of December 2013.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

1095635

EXHIBIT A

**BMW
GROUP**



Rolls-Royce
Motor Cars Limited

BMW MC
1400 HW 101S, Spartanburg, SC 29607

Your reference **AT&T new block DID request**
Your message dated
Department/From
Telephone
Fax
E-mail
Date **10/2013**
Subject **AT&T new block DID request**

Company
Bayerische
Motoren Werke
Aktiengesellschaft
Postal address
BMW AG
80788 München
Office address
Petuelring 130
Office address
Forschungs- und
Innovationszentrum (FIZ)
Kronstraße 147
Telephone
Switchboard
+49 89 382-0
Fax
+49 89 382-25858
Internet
www.bmwgroup.com
Bank details
BMW Bank GmbH
Account No.
5 100 940 940
Bank Code
702 203 00
IBAN DE02 7022 0300
5100 9409 40
SWIFT(SIC)
BMWDBEM1
**Chairman of
Supervisory Board**
Jochim Milberg
**Board of
Management**
Norbert Reithofer
Chairman of the Board
Milagros Cañía Carreiro-
Andree
Herbert Diess
Klaus Draeger
Friedrich Eichinger
Harald Krüger
Ian Robertson
Peter Schwarzenbauer
**Registered in
Germany**
München HRB 42243

AT&T Number Administration/Code Administration;


This Letter of Intent represents a request by BMW Manufacturing for 10,000 numbers for Prime Service. BMW Manufacturing intends to order service, in the Greer, SC rate center, on the GRERSCMA87F wiring center switch pending AT&T's successful completion of the required testing. BMW intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

BMW has experienced tremendous growth and currently has over 6000 employees with only 3800 DIDs in a semi-contiguous block. For future growth needs, it has become necessary to request an entire NPA/NXX for business continuity.

Sincerely,

W. H. Reithofer 11/22/13
BMW

EXHIBIT B

Pooling Administration System	
 rw0052@att.com (SP)	<div style="text-align: right;">• Sign Out</div> <div style="text-align: center; border-top: 1px solid black; border-bottom: 1px solid black; margin: 5px 0;">Time : 11/15/2013 10:47:15 AM EST</div> <div style="text-align: right; margin-bottom: 10px;">Printable Version</div> <div style="text-align: center; margin-bottom: 20px;"> Central Office Code (NXX) Assignment Request Part 1 December 9, 2005 </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>Tracking Number: 864-GREER-SC-686084</p> <p>Full NXX: Dedicated Customer</p> </div> <div style="width: 65%;"> <p>Type of Application: New Change Delete</p> </div> </div> <div> <p>1.0 GENERAL INFORMATION</p> <p>1.1 Contact Information:</p> <p><u>Code Applicant:</u></p> <p>Company/Entity Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</p> <p>Headquarters Address: 500 Broad St SE</p> <p>City, State, Zip: Gainesville ,GA ,30501</p> <p>Contact Name: Rena Buttica</p> <p>Contact Address: 500 Broad St SE</p> <p>City, State, Zip: Gainesville, GA, 30501</p> <p>Phone: 770-945-9630 FAX: 770-945-9630 E-mail: rw0052@att.com</p> <p><u>Code Administrator:</u> ²</p> <p>Name: Michael Ortega</p> <p>Address: 46000 Center Oak Plaza</p> <p>City, State, Zip: Sterling ,VA ,20166</p> <p>Phone: 571-434-5348 FAX: 571-434-5502</p> </div> <div style="margin-top: 20px;"> <p>NXX: ³ LATA: 430 OCN: ⁴</p> <p>1.2 NPA: 864 9417 Parent Company's OCN(s)</p> <p style="margin-left: 100px;">9400</p> <p>Switching Identification(Switch Entity/POI) ⁵</p> <p>GRERSCMA87F</p> <p>Locality/City/Wire Center: Rate Center: ⁶ GREER</p> <p>Homing Tandem Operating Co: ⁷ Tandem Homing</p> <p>AT&T CLLI</p> <p style="margin-left: 100px;">⁸ GNVLSCDT60T</p> </div> <div style="margin-top: 20px;"> <p>1.3 <u>Dates:</u> Date of Request Effective Date: ⁹ ¹⁰</p> <p style="margin-left: 100px;">Application: 11/15/2013 01/20/2014</p> </div>

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes _____ No X

1.4 a) Type of company/entity requesting the code: Incumbent
Local Exchange Carrier (ILEC) (LEC, IC, CMRS, Other)

b) Types of service: Wireline (e.g., Cellular - Type 2)

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

e) Type of change (Mark all that apply)

☐ OCN-Intra-company ¹¹ ☐ Switching Id ☐ Rate Center
☐ Tandem Homing CLLI

☐ OCN-Inter-company ¹² ☐ Effective Date ☐ LATA
☐ Extend Reservation

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☐ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments: _____

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁴

Sr.

Rena Buttica

Signature of Code Applicant

Specialist 11/15/2013


Title Date

- ¹ Identify type and reason for change(s) in Section 1.4(e).
- ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- ³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
- ⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.
- ⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
- ¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.
- ¹¹ Select if you are the current Code Holder
- ¹² Select if you are not the current Code Holder
- ¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- ¹⁴ An incomplete form may result in delays in processing this request.

[Back](#)

neustar

Question? Email us
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Pooling Administration System	
 rw0052@att.com (SP)	Sign Out
Time : 11/15/2013 10:47:34 AM EST	
<div style="border: 1px solid black; padding: 2px;">• Individual Block Requests</div> <div style="border: 1px solid black; padding: 2px;">• CO/NXX Code Requests</div> <div style="border: 1px solid black; padding: 2px;">• Withdraw Pending Requests</div> <div style="border: 1px solid black; padding: 2px;">• Confirm Resources In Service</div> <div style="border: 1px solid black; padding: 2px;">• Donate Blocks</div> <div style="border: 1px solid black; padding: 2px;">• Submit Forecast</div> <div style="border: 1px solid black; padding: 2px;">• Search Forms</div> <div style="border: 1px solid black; padding: 2px;">• Reports</div> <div style="border: 1px solid black; padding: 2px;">• User Profile</div>	<div style="text-align: right; font-size: small;">Printable Version TBPAG Attachment 1 - March 19, 2007</div> <div style="text-align: center; margin-top: 20px;">Thousands-Block Application Form - Part 1A</div> <div style="margin-top: 20px;">Tracking Number: <u>864-GREER-SC-686084</u> Full NXX: <u>Dedicated Customer</u></div> <div style="margin-top: 20px;">Type of Application: <input checked="" type="radio"/> New <input type="radio"/> Change <input type="radio"/> Disconnect</div> <div style="text-align: center; margin-top: 20px;"><u>GENERAL APPLICATION INFORMATION</u></div> <div style="margin-top: 10px;">1.1 Contact Information: Block Applicant: Company Name: <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u> Headquarters Address: <u>500 Broad St SE</u> City, State, Zip: <u>Gainesville, GA, 30501</u> Contact Name: <u>Rena Buttica</u> Contact Address: <u>500 Broad St SE</u> City, State, Zip: <u>Gainesville, GA, 30501</u> Phone: <u>770-945-9630</u> FAX: <u>770-945-9630</u> E-mail: <u>rw0052@att.com</u></div> <div style="margin-top: 10px;">Pooling Administrator: ⁱⁱ Contact Name: <u>John Auerbach</u> Contact Address: <u>1800 Sutter St. Ste. 780</u> City, State, Zip: <u>Concord, CA, 94520</u> Phone: <u>925-363-8706</u> FAX: <u>925-363-7684</u> E-mail: <u>john.auerbach@neustar.biz</u></div> <div style="margin-top: 20px;">1.2 General Information: Check one : No LRN needed <input checked="" type="checkbox"/> X LRN needed ⁱⁱⁱ <input type="checkbox"/></div> <div style="margin-top: 20px;">NPA: <u>864</u> LATA: <u>430</u> OCN: ^{iv} <u>9417</u> Parent Company's OCN: <u>9400</u> Number of Thousands-Blocks Requested : <u>10</u></div>

Switching Identification(Switch Entity/POI) : ^v
GRERSCMA87F

City or Wire Center Name : _____

Rate Center: ^{vi}
GREER

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 11/15/2013

Requested Block Effective Date: ^{viii}
01/20/2014

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for : Wireline

c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) N/A

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark all that apply)

OCN:Intra-company ^{ix} Switching Id Part 1B

OCN:Inter-company ^x Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

a) Is this block Contaminated Yes _____ No _____

b) If Yes how many TNs are NOT available for assignment : _____

c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____

d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Rena Buttica

Signature of Block Applicant

Sr.
Specialist **11/15/2013**
Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider¹. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by

signing their name, and providing their title and date.












Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block (s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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neustar

Question? Email us
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Pooling Administration System	
 rw0052@att.com (SP)	Sign Out
Time : 11/15/2013 10:48:13 AM EST	
 Printable Version	
 Individual Block Requests	November 21, 2003 ATIS-0300066.at3
 CO/NXX Code Requests	Attachment 3
 Withdraw Pending Requests	Pooling Administrator's Response/Confirmation TBPAAG Part 3
 Confirm Resources In Service	Tracking Number : <u>864-GREER-SC-686084</u>
 Donate Blocks	Date of Application: <u>11/15/2013</u> Effective Date: _____
 Submit Forecast	Date of Receipt: <u>11/15/2013</u> Date of Response: <u>11/15/2013</u>
 Search Forms	Service Provider Name: <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u>
 Reports	(Telcordia TM LERG TM Routing Guide) OCN: <u>9417</u>
 User Profile	Parent Company OCN: <u>9400</u>
	NPAC SOA SPID : _____
	Pooling Administrator Contact Information:
	John Auerbach Phone: <u>925-363-8706</u>
	Signature of Pooling Administrator
	John Auerbach Fax: <u>925-363-7684</u>
	Name (print)
	Email: <u>john.auerbach@neustar.biz</u>
	NPA-NXX or NPA-NXX-X : _____
	Block Assigned: _____
	Block Reserved : _____
	Block Reservation Expiration Date : _____
	Block/Code Modified : _____
	Block/Code Disconnected : _____
	Block Contaminated(Yes or No) : _____
	If Yes,enter the number of TNs contaminated : _____
	Switch Identification(Switch Entity/POI): ¹ <u>GRERSCMA87F</u>
	Rate Center: <u>GREER</u>
	Rate Center Sub Zone: _____

☒ **Form Complete, request denied.**

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

☐ **Request withdrawn.**

Explanation:

☐ **Assignment activity suspended by the administrator.**

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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Pooling Administration System																																																			
rw0052@att.com (SP)	Sign Out																																																		
Time : 11/15/2013 10:47:54 AM EST																																																			
<div> </div> <div> Individual Block Requests ICO/NXX Code Requests Withdraw Pending Requests Confirm Resources In Service Donate Blocks Submit Forecast Search Forms Reports User Profile </div>	<div style="text-align: right;">Printable Version May 16, 2008</div> <p>Appendix 3 MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹ (Thousands-Block Number Pooling Growth Block Request)</p> <p>Tracking Number: <u>864-GREER-SC-686084</u></p> <p>Date: <u>11/15/2013</u> OCN: <u>9417</u> Company Name: <u>BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</u></p> <p>Rate Center: <u>GREER</u></p> <p>List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):</p> <p>Name of Block Applicant: <u>Rena Buttica</u> Signature: <u>Rena Buttica</u></p> <p>Title: <u>Sr. Specialist</u> Telephone No.: <u>770-945-9630</u> FAX No.: <u>770-945-9630</u></p> <p>E-mail: <u>rw0052@att.com</u></p> <p>A. Available Numbers: <u>10967</u></p> <p>B. Assigned Numbers: <u>26859</u></p> <p>C. Total Numbering Resources: <u>41333</u></p> <p>D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: <u>0</u></p> <p>List Excluded Code(s) or Block(s):</p> <table style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th></th> <th>Month #1</th> <th>Month #2</th> <th>Month #3</th> <th>Month #4</th> <th>Month #5</th> <th>Month #6</th> <th>Month #7</th> <th>Month #8</th> <th>Month #9</th> <th>Month #10</th> <th>Month #11</th> <th>Month #12</th> </tr> </thead> <tbody> <tr> <td>E. Growth History - Previous 6 months³</td> <td><u>-68</u></td> <td><u>39</u></td> <td><u>-60</u></td> <td><u>-71</u></td> <td><u>789</u></td> <td><u>26</u></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>F. Forecast - Next 12 months⁴</td> <td><u>109</u></td> <td><u>10109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> <td><u>109</u></td> </tr> </tbody> </table> <p>G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): <u>1775.667</u></p>													Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	E. Growth History - Previous 6 months ³	<u>-68</u>	<u>39</u>	<u>-60</u>	<u>-71</u>	<u>789</u>	<u>26</u>							F. Forecast - Next 12 months ⁴	<u>109</u>	<u>10109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>	<u>109</u>
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12																																							
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H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

10967

Months To Exhaust

6.176

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= **64.982**

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.











⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System	
 rw0052@att.com (SP)	• Sign Out
Time : 11/15/2013 10:46:30 AM EST	
<ul style="list-style-type: none">•  Individual Block Requests•  JCO/NXX Code Requests•  Withdraw Pending Requests•  Confirm Resources In Service•  Donate Blocks•  Submit Forecast•  Search Forms•  Reports•  User Profile	<h3>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</h3> <p>Your Utilization calculates to 64.982%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</p> <p>Select One Option and Submit</p> <p><input checked="" type="radio"/> Return to the Months To Exhaust Form</p> <p><input type="radio"/> Need to request a State Waiver</p> <p><input type="radio"/> Received a State Waiver</p> <p><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p>
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STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Greer Rate Center to be served by the method indicated below upon the following this December 4, 2013.

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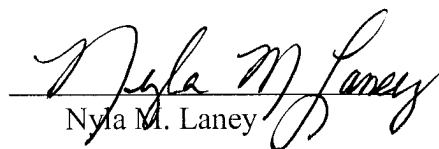
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Nyla M. Laney